

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HYPERQUEST, INC.,)	
)	
Plaintiff,)	Case No. 08 C 485
)	
v.)	Judge Charles R. Norgle
)	Magistrate Judge Cole
NUGEN I.T., INC. , and DAYLE)	
PHILLIPS)	JURY DEMAND
)	
Defendants.)	

HYPERQUEST’S MOTION FOR LEAVE TO FILE 33-PAGE BRIEF

HyperQuest, Inc. f/k/a HQ, Inc. (“HQ”) hereby respectfully seeks leave pursuant to Local Rule 7.1 to file a 33-page Opposition To Defendants' Motion To Dismiss For Lack Of Personal Jurisdiction And To Phillips’ Motion For Judgment On The Pleadings. In support thereof, HQ states as follows:

1. On March 4, 2008, NuGen I.T., Inc. (“NuGen”) and Dayle Phillips (“Phillips”) (collectively “Defendants”) filed their Motion To Dismiss For Lack Of Personal Jurisdiction And To Dismiss Defendant Phillips For Failure To Make A Special Showing of Personal Liability, with a memorandum in support of the motion and two supporting affidavits.

2. Defendants’ papers provide only a cursory description of the facts, and ignore numerous facts that demonstrate the appropriateness of personal jurisdiction over both defendants. In addition, Defendants essentially combine two dispositive motions into a single motion.

3. In order to fully inform the Court of the relevant facts and applicable law regarding both of Defendants’ motions, HQ has required 33 pages of text. With

apologies to the Court, HQ could not adequately address in fewer pages all of the factual and legal issues before the Court.

WHEREFORE, HyperQuest, Inc. respectfully requests that the Court grant it leave to file its 33-page Opposition To Defendants' Motion To Dismiss For Lack Of Personal Jurisdiction And To Phillips' Motion For Judgment On The Pleadings, a copy of which is attached hereto as Exhibit A.

Respectfully submitted,

HYPERQUEST, INC.

By: /s/ Deborah Rzasnicki Hogan
One of Its Attorneys

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